RESPONSE TO THE REVISED REMEDIAL INVESTIGATION WORK PLAN REVIEW COMMENTS
STAR LAKE CANAL SUPERFUND SITE, JEFFERSON COUNTY, TEXAS
JULY 10, 2007

Item No.	*Reference*	*Comment made by*	*Comment*	*Response*
GENERAL COMMENTS				
1a	General	Ash & Tischler, US Fish & Wildlife Service	While the revised draft does state that additional sampling will be performed in Tier 2 if the presence of COCs posing ecological risk is found at locations from Tier 1, this does not entirely address our concern regarding adequacy of the Tier 1 sampling. One of our concerns is that certain areas within the "potential area of concern" are not being sampled at all (see our previous comments on Molasses Bayou especially the southeast corner, wetlands adjacent to the canal, and the confluence with Neches River). There are several portions of the site not represented by even a single sample of any media. If an area is never sampled in Tier 1, why would Tier 2 sampling occur in that area if there will be no Tier 1 samples to indicate levels at ecological risk? We feel more samples are needed in this area since the revised draft failed to provide justification or clarification of the current sampling plan. For example, we requested a minimum of 2 samples be added to the Molasses Bayou area to increase coverage. Instead the revised draft shows one sample was moved from one location to another, and none were added.	The sample locations were selected based on a source and path rational as described in the Work Plan. There is no reason to suspect that constituents would be located in the southeast portion of Molasses Bayou because there is no known source and no pathway. Sediment transport and deposition resulting from flood stage sheet flow are not believed to be a major pathway. Meteorological and streamflow data pertinent to the site were compiled and reviewed. The frequency of severe precipitation and flood events is extremely low. As shown on Exhibit 1 of the Revised Work Plan, the water elevations measured at the Rainbow Bridge gaging station are not those that would result in overland flow in Molasses Bayou. During periods of overland flow, constituent concentrations in sediment would be reduced due to the amount of additional sediment input from outside the source area into the sediment budget. Nevertheless, two additional samples will be proposed in Jefferson Canal, two additional samples will be located in Star Lake Canal, and three additional samples will be proposed in the vicinity of Molasses Bayou
1b	General	Ash & Tischler, US Fish & Wildlife Service	Secondly, we expressed concern that portions of the sampling plan (i.e. sediment and surface water in Jefferson Canal) have too few samples for the distance represented. Again the revised draft fails to provide justification for location and number of samples. Additional surface sediment samples should be added to the proposed Star Lake Canal and Molasses Bayou sample suite to ensure effective geographic coverage. The historical data provided and utilized to develop the proposed sampling locations supports the need for greater spatial coverage given that data's limited coverage and restricted utility (Section 2.1). The proposed sample locations along Star Lake Canal are spaced sufficiently far apart as to miss contaminant hotspots of significant size (i.e., 900 ft.), as are those within the interior of Molasses Bayou. Based upon the historical rationale cited, additional samples should also be provided within Molasses Bayou to address sediment transport and deposition resulting from flood stage sheet flow (Section 6.2.1.3) which may remobilize contaminated sediments into areas (identified as intervening marshland)	See Response to Comment No. 1a
2	General	Ash & Tischler, US Fish & Wildlife Service	The revised document fails to address the criteria previously identified by the Trustees of habitat suitability as the basis for inclusion of threatened and endangered (T & E) species in the evaluation of potential receptor species. Text indicating the observed occurrence of T & E species as criteria for inclusion remains (Section 3.4) in conflict with the Trustee comment. Pending concurrence from Texas Parks and Wildlife and the US Fish and Wildlife Service on the proposed receptor list is insufficient justification to omit T & E species that may occur from the preliminary list. Additionally the Brown Pelican has not been added as a potential receptor as requested in prior Trustee comments.	The T&E that may occur at the site will be added in the receptors of concern (ROC) list, including the Brown Pelican.

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3	General	White, National Oceanic and Atmospheric Administration	While it is understood that additional sampling beyond what is proposed in the current Work Plan is likely, the sampling described in the Work Plan should be expanded to be more comprehensive in scope. The trustees noted in previous comments that some areas were not covered at all, and that it was not clear how the sample size and distribution was decided. One of the concerns is that certain areas within the "potential area of concern" are not being sampled at all (see previous comments on Molasses Bayou especially the southeast corner, wetlands adjacent to the canal, and the confluence with Neches River". There are several portions of the site not represented by even a single sample of any media. If an area is never sampled in Tier 1, why would Tier 2 sampling occur in that area if there will be no Tier 1 samples to indicate levels at ecological risk? To be efficient, the initial sampling effort should utilize the available sample data (from the SSI, ESI) to determine the locations for sampling (based upon past distribution) and number of samples (based upon variability of contaminant concentrations in media).	The sample locations were selected based on a source and path rational as described in the Work Plan. There is no reason to suspect that constituents would be located in the southeast portion of Molasses Bayou because there is no known source and no pathway. Nevertheless, two additional samples will be proposed in Jefferson Canal, two additional samples will be proposed in Star Lake Canal, and three additional samples will be proposed in the vicinity of Molasses Bayou to further expand the sample collection locations.
SPECIFIC COMMENTS; Section 3				
4	Section 3.3 page 3-3	Ash & Tischler, US Fish & Wildlife Service	Frequency of detection should not be used at the Tier 1/SLERA level to remove contaminants from further assessment in the Tier 2/BERA if they exceeded the ecological screening benchmark. Site-specific adjustments based upon contaminant distribution, frequency, and receptor use of affected habitat may be made during the BERA.	Constituents with low frequencies of detection in the Tier 1 sediment and surface water samples that exceed ecological screening benchmarks will be retained for further assessment in Tier 2. In Tier 2 sediment and surface water samples will be collected in the vicinity of the locations of Tier 1 samples that had constituent(s) detected above the ecological benchmark. The Tier 2 samples in a given area of the site will be analyzed for the constituent(s) that were detected above ecological screening benchmarks in that area of the site during Tier 1.
5	Section 3.4.2 pages 3-10-3-11	Ash & Tischler, US Fish & Wildlife Service	We resubmit the following comments which the revised draft has not addressed: The characterization of the muskrat exposure in the text is incorrect. *Muskrats are primarily aquatic animals, burrowing into the sediments of marshes or river banks or shorelines. They feed primarily on aquatic vegetation. Therefore they will be exposed to contaminants primarily through aquatic vegetation, surface water and sediments, not soil as the report indicated.* Please revise accordingly.	The Work Plan will be revised as requested.
6	Section 3.4.2 page 3-10	Ash & Tischler, US Fish & Wildlife Service	It is unlikely much information will be available to estimate risk to the white-faced ibis, therefore we suggest using a surrogate species. The RI Work Plan should indicate which surrogate species will be used, and should discuss using conservative assumptions (NOAELs) for the selected surrogate.	The Work Plan will be revised as requested.
7	Section 3.6.1 pages 3-12-3-14	Ash & Tischler, US Fish & Wildlife Service	Although the text states that shorebirds will be exposed to bank soils, the conceptual exposure model for the site lists the pathways for shorebirds and waterfowl as incomplete. Please revise. Please revise the food web also showing more utilization of the "wetland" and "bank soil."	The Work Plan conceptual site model will be revised as requested.
8	Section 3.3 pages 3-3	White, National Oceanic and Atmospheric Administration	Frequency of detection should not be used to eliminate contaminants from further assessment in the risk assessment. Contaminants with concentrations exceeding ecological screening benchmarks should be retained for further assessment. Also, consideration should be given to contaminants with low frequency of detection, but present at high concentrations as they may represent hot spots within the area of concern.	See Response to Comment No. 4